

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**PERSONALIZED MEDIA
COMMUNICATIONS, LLC,**

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:19-cv-00090-JRG

JURY TRIAL DEMANDED

**DECLARATION OF PATRICK ORR IN SUPPORT OF DEFENDANT GOOGLE LLC'S
MOTION TO DISMISS FOR IMPROPER VENUE**

I, Patrick Orr, declare and state as follows:

1. I am a People Analyst at Google LLC ("Google"). I have been a Google employee since 2014, including in the following locations: Boulder, Colorado, and Mountain View, California.

2. I provide this declaration in support of Google's motion to dismiss. I submit this declaration on my knowledge of the corporate structure of Google and my investigation into facts relating to the complaint filed by Personalized Media Communications, LLC on March 21, 2019.

3. As a People Analyst, I am responsible for analytics on topics including employee retention and organizational design. As a member of Google's People Operations department, I have access to and am familiar with relevant data regarding Google's operations, staff, and physical presences.

4. Google has been headquartered in the Northern District of California since its founding in 1998. It has been headquartered in Mountain View, California, in the Northern District of California, since at least 2004.

5. Google's predecessor, Google Inc., was incorporated in Delaware. Google has since converted to an LLC, but remains registered in Delaware.

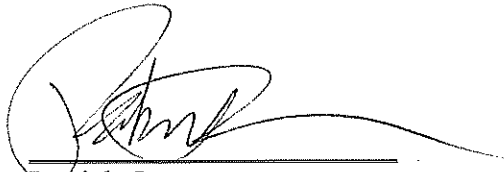
6. Both today and in March 2019, decisions related to Google's overall business are made by managers and other employees located in Northern District of California including most significant engineering, sales, and marketing decisions related to Google's accused products. Most or all senior management relating to Google's accused products are and have been located in the Northern District of California.

7. Google does not maintain an office in the Eastern District of Texas, which I understand includes the counties identified on the Eastern District of Texas' website

(<http://www.txed.uscourts.gov/court-locator>). Accordingly, Google has no employees who work at any Google office in the Eastern District of Texas, including those involved in the design, development or management of the Google products accused in this case.

8. Google does maintain offices in Austin, Texas and San Antonio, Texas, both of which are in the Western District of Texas, and an office in Dallas (Addison), Texas, in the Northern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 30, 2019, in Boulder, Colorado.



Patrick Orr